

Pro Se I (Rev. 12/16) Complaint for a Civil Case

FILED- LN

March 28, 2024 10:05 AM
 CLERK OF COURT
 U.S. DISTRICT COURT
 WESTERN DISTRICT OF MICHIGAN
 BY: eod FILED BY: *[Signature]*

UNITED STATES DISTRICT COURT

for the 6TH

FEDERAL District of MICHIGAN

SOUTHERN Division

1:24-cv-323

Phillip J. Green

U.S. Magistrate Judge

George Taylor Carl Vines

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Calhoun County Sheriff Department, Et Al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>George Taylor Carl Vines</u>
Street Address	<u>185 E Michigan Ave</u>
City and County	<u>Battle Creek Calhoun County</u>
State and Zip Code	<u>49014-4066, Michigan</u>
Telephone Number	<u>N/A - Incarcerated</u>
E-mail Address	<u>N/A Incarcerated</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se I (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Calhoun County Sheriff Department

161 E Michigan Ave
Battle Creek Calhoun County
49014, Michigan
269-969-6450

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Steven Hinkley

161 E Michigan Ave
Battle Creek Calhoun County
49014, Michigan
269-969-6450

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- ☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

8th Amendment Violation - Deliberate Indifference
14th Amendment Violation - Failure to provide Equal protection of the Law

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) George Taylor Carlines, is a citizen of the State of (name) Michigan.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) Steven Hinkley, is a citizen of the State of (name) Michigan. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Calhoun County Sheriff's Dept., is incorporated under the laws of the State of (name) Michigan, and has its principal place of business in the State of (name) Michigan.
Or is incorporated under the laws of (foreign nation) Michigan, and has its principal place of business in (name) Michigan.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Rule 7 Inmates rights, The protection rights, Corporal punishment rights, unnecessary or excessive use of force, See Appendix A These Actions Are a Violation of My 8th and 14th Amendment protections.
\$250,000 + whatever the courts deem necessary.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On 6/06/23 to the On Duty Deputy's Night and Day shift I reported That I Didn't feel safe in my Cell Do to How My New roommate was Acting. I told The pool Dep Around ~~9:30~~ 9:30 AM I Don't feel comfortable in My Cell, She Told Me to Kite Class By the time I got a response it was far to late. Also During That Morning Deputy Carson Told Me to Hush up about it. On Night shift I Alerted Deputy Jennings Two Time When She Finally Decided to listen She Made A Mockery And Threatend to give Me A Write up.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I'm Seeking \$250,000 for Vito Violation Of rights And Damage And undo Hardship

I find it odd and if not strange with all the signs or posters saying don't be afraid to ask for help, I did 3 or more times, with me being a victim of sexual abuse as a minor and them having it noted. I just don't see and understand after saying, and telling the only source who are sworn in by the public oath office, I don't feel safe and my history to the depts who was on duty at these times. Why was I being told to risk my safety to someone wasn't there yet when someone was there, Class, Reference # 16463518. Also why did they wait till I was grouse to take action and reclass me from pod B to D and the next day being chastise by a dep saying all day I been tryin to get out that cell and manage to do so as if I was a animal. I find and feel like him say that to an inmate was very unproductively professional which falls in their handbook of rights. And the fact that another deputy said he finds it hard to believe any of the things I reported because the other inmate was ICE was disturbing I feel belittled they reclass me to low pods and let the other get away while I had to then walk the halls with shackles on my ankles for doing what your suppose to when you don't feel safe. (SEE APPENDIX A)

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

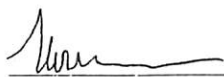

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/17/24

Signature of Plaintiff

Printed Name of Plaintiff

 
George Taylor Carl Vines

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

165 E Michigan Ave
Battle Creek MI, 49014
George Taylor Carl Vines

United
113 Fe
315
LANSI
Of



States District Court
Federal BLDG
W. ALLEGANST.
NG MI, 48933
FICAL Bussiness.